



U.S. Department of Justice

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

August 27, 2020

**BY ECF**

The Honorable Lewis J. Liman  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, N.Y. 10007

**Re: *United States v. Lawrence Ray*, 20 Cr. 110 (LJL)**

Dear Judge Liman:

The Government writes in response to the Court's August 27, 2020 Order. (Dkt. 42). In advance of the next conference, the Government would like to provide the Court with materials referenced in the parties' briefing. The defense seeks an unprecedented and drastic change to the protective order. Such a change is particularly unwarranted where the defense continues to demur on identifying with specificity any material that the Government has improperly designated as sensitive, other than pointing to the "materials the defense explicitly requested the Government release from the sensitive designation" (Dkt. 42, Reply Br. 4), and which the Government listed in its brief (Dkt. 38, Gov. Br. 7). In order for the Court to better understand the parties' dispute, and to appreciate firsthand that this evidence is properly marked as "sensitive," the Government intends to provide copies of some of these materials to the Court, but requests to file the materials under seal because they are currently marked "sensitive" and contain private information about victims and potential witnesses in this case, including graphic sexual content, videos of physical and verbal abuse, and videos that are potentially humiliating to the third parties depicted in them. The Government also intends to provide defense counsel a copy of these materials, which the defense has also already received in "sensitive" discovery.

Respectfully submitted,

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